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September 17, 2021

VIA ELECTRONIC MAIL

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for
Limited Waivers and Request for Approval of Updated Service Regulations
Docket No. 2021-91-E

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff (“ORS”) hereby notifies the Public Service Commission of South Carolina (“Commission”) that ORS has reviewed the original and updated Petitions filed jointly in this docket by Duke Energy Carolinas LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively “Companies”).

On March 10, 2021, the Companies petitioned for Commission approval of limited waivers to S.C. Code Ann. Regs. 103-339 and 103-321 and Sections III.A.2(a)-(b) of the Companies’ Code of Conduct and approval of the Companies’ updated service regulations (“Original Petition”).¹ Following the filing of the Original Petition, ORS submitted discovery on the matter to the Companies, reviewed the Companies’ responses, and had discussions with the Companies regarding the Original Petition.

On August 26, 2021, the Companies filed an Amended Petition for Limited waivers and Request for Approval of Updated Service Regulations (“Amended Petition”). Concurrently, the Companies’ filed a Request for Approval of Revert to Owner Program (“Landlord Program”) in this docket.²

¹The Original Petition also provided the Commission information regarding certain Customer Connect updates.

²In the Original Petition, the Companies’ sought approval of a Revert to Owner Program as a part of the Original Petition. *See* Attachment 3, Original Petition.

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In the Amended Petition, the Companies requested approval of certain updates to service regulations, approval of the Companies' Quarterly Budget Billing plan, and a limited waiver of Sections III.A.2.(a)-(b) of the Companies' Code of Conduct.

According to the Amended Petition, the requests "will allow the Companies to upgrade their billing system infrastructure to better support dynamic rate designs; standardize the monthly billing period by extending it by two days; extend the remittance period for non-residential customers from fifteen to twenty-five days; and grant the Companies more flexibility in reviewing a customer's payment history to potentially eliminate the need for a deposit when relocating from one Duke Energy jurisdiction to another."³

In the Amended Petition, the Companies are requesting several updates to language in their respective service regulations. First, DEP is requesting Commission approval of service regulation language that provide the Company's metering and billing practices for interval-billed rate schedules. ORS reviewed DEP's proposed bill forms and find they conform to S.C. Code Ann. Regs. 103-339. ORS also reviewed DEP's proposed service regulation language regarding the billing of interval-load rate schedules and finds it reasonable.

Second, the Companies request Commission approval of updates to the respective service regulations to define the billing month as 26-34 days. ORS has reviewed the Companies' respective proposed service regulation language for the billing month and does not oppose this request.

Third, the Companies are requesting Commission approval of Quarterly Budget Billing Plans and associated updates to their respective service regulations. ORS has reviewed the plans and the service regulation updates and does not oppose this request.

The Companies requested a limited waiver of Section III.A.2(a)-(b) to the Companies' Code of Conduct. ORS reviewed this request and found that the waiver is limited in nature as it would only apply to an existing Duke Energy customer transferring service from one jurisdiction to another. ORS determined that the request is in line with the deposit requirements in Reg. 103-331(A)(2), appropriately requires customer consent if a credit check is deemed necessary, and is a benefit to both the customer and the Companies. ORS does not oppose this request.

The Companies also requested approval to extend the non-residential remittance period from 15 to 25 days. This request requires changes to DEC's service regulations and remittance

³ Amended Petition, pp. 1-2.

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language in DEP's tariffs for non-residential rate schedules. ORS has reviewed the updates to DEC's service regulation and DEP's tariffs and does not oppose this request.

Finally, as mentioned above, the Companies filed a separate request for approval of changes to their Landlord Programs. ORS reviewed the information regarding the program and proposed changes and the respective updates to the Companies' service regulations. ORS does not oppose this request.

Based on the aforementioned, ORS does not oppose the Companies' requests as submitted in the Amended Petition.

Sincerely,



Andrew M. Bateman

cc: All Parties of Record (via electronic mail)
Jo Ann Wessinger-Hill, Esquire (via electronic mail)
David Butler, Esquire (via electronic mail)